

# EXHIBIT 3

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

BRIAN LUCAS, ARONZO DAVIS and  
NORMAN GREEN, on behalf of themselves and  
similarly situated laborers,

Plaintiffs,

v.

GOLD STANDARD BAKING, INC.,  
PERSONNEL STAFFING GROUP, LLC d/b/a  
MOST VALUABLE PERSONNEL d/b/a MVP,

Defendants.

Case No. 13 C 1524

Judge Ellis

Magistrate Judge Kim

**PLAINTIFFS' AMENDED F.R.C.P. 26(a)(1) DISCLOSURES**

Plaintiffs, through their attorneys, and in accordance with Rule 26(a)(1) of the Federal Rules of Civil Procedure, submit the following revised disclosures to Defendants Personnel Staffing Group, LLC ("MVP") and Gold Standard Baking, Inc. ("GSB").

**A. The following persons, other than Plaintiffs and witnesses identified by MVP and GSB in each's revised 26(a)(1) disclosures, may have discoverable information that Plaintiffs may use in support of their claims:**

***Human Resources Employees of GSB, currently unknown;***

Other Human Resource employees of GSB not identified in GSB's revised 26(a)(1) disclosures who dealt with securing laborers from MVP. Such persons have knowledge of the laborers assigned to work at GSB by MVP, the job assignments given to such laborers, the employment criteria for such assignments, any specific requests made by GSB to MVP relating to the assignment of laborers, GSB's general policies and practices relating to discrimination, past claims of discrimination, job duties of MVP laborers, decisions about requesting certain laborers not be returned, among other information.

***Production Line Supervisors of GSB, including Maria Carretero and others currently unknown;***

Maria Carretero and other Production Line Supervisors not identified in GSB's revised 26(a)(1) disclosures. Such persons have knowledge of the laborers assigned to work at GSB by MVP, the job assignments given to such laborers, the job duties of such laborers and GSB employees, the requirements for performing such jobs such jobs and decisions about requesting certain laborers not be returned, among other information.

***Other Hourly Employees of GSB, currently unknown;***

Other hourly employees of GSB who worked side-by-side with MVP laborers are likely to have knowledge of the job duties of MVP laborers assigned to GSB and specific job requirements for working at GSB, among other information.

***Other Management Employees of GSB, currently unknown;***

Other management employees of GSB not identified in GSB's revised 26(a)(1) disclosures. As individuals who dealt with the overall operation of GSB, including the record-keeping policies, discrimination policies, contract negotiations between GSB and MVP for MVP's services, among other information.

***Other Human Resources Employees of MVP, currently unknown;***

Other Human Resource employees of MVP not identified in MVP's revised 26(a)(1) disclosures. As individuals who dealt with supervising the recruitment and assignment of laborers from MVP to GSB, such persons have knowledge of the laborers assigned to work at GSB by MVP, the job assignments given to such laborers, the employment criteria for such assignments, any specific requests made by GSB to MVP relating to the assignment of laborers, MVP's general policies and practices relating to discrimination, past claims of discrimination, job duties of MVP laborers, decisions about requesting certain laborers not be returned, MVP's record keeping policies, among other information.

***Recruiters and Dispatchers of MVP, including Pamela Sanchez, Rose Ceja and others currently unknown;***

Other Recruiters and Dispatchers of MVP not identified in MVP's revised 26(a)(1) disclosures. As individuals who dealt directly with recruiting and assigning laborers from MVP who sought assignments at third party client companies, including GSB the process by which work assignments were given out, MVP's record keeping policies and practices, MVP's advertising and recruitment practices, specific requests made by GSB to MVP relating to laborers and their qualifications, among other information.

***Former Onsite Supervisors and Managers of MVP at GSB's facility, including Janet Rostro, Pamela Sanchez, Daisy Corral, Vanessa Guerra and others currently unknown;***

Other Onsite Supervisors and Managers of MVP working at GSB's facility not identified in MVP's revised 26(a)(1) disclosures. As individuals who dealt with directly with MVP laborers onsite at GSB, such persons have knowledge of the laborers assigned to work at GSB by MVP, the job assignments given to such laborers, the job duties of such laborers and GSB employees, the requirements for performing such jobs such jobs and decisions about requesting certain laborers not be returned, among other information.

***Other Management Employees of MVP, including Lisette Robles and others currently unknown;***

Other management employees of MVP not identified in MVP's revised 26(a)(1) disclosures. As individuals who dealt with the overall operation of MVP, including the record-keeping policies, discrimination policies, contract negotiations between GSB and MVP for MVP's services, among other information.

*Other Laborers Who Sought Work Assignments through MVP, including Antwoin Hunt, James Zollicoffer, James Lewis, Kevin James and others currently unknown;*

Antwoin Hunt, James Zollicoffer, James Lewis, Kevin James, who may be reached through Plaintiffs' counsel, and other laborers who sought work assignments through MVP are likely to have knowledge of the process for seeking work assignments, how work assignments were given out, specific job requirements for working at GSB, among other information.

**B. A copy of or description of documents and tangible things that are relevant to Plaintiffs' Claims.**

Plaintiffs are not in possession of documents or tangible things relevant to their claims other than what has already been produced. The records of Defendants and other materials sought by Plaintiffs in discovery will also be relevant. Investigation continues.

**C. The computation of any category of damages claimed by the disclosing party:**

At this time, Plaintiffs seek, on behalf of themselves and a class African Americans who sought work assignments from MVP's Cicero Office and, on one or more occasions were not assigned to work at GSB, the relief specified in Plaintiffs' Fifth Amended Complaint in this matter. Plaintiffs will require additional discovery before he can fully identify with particularity the amount of lost earnings. Further, Plaintiffs cannot identify at this time the amount of punitive damages other than to assert that he seeks punitive damages on behalf of the class, of which they will be members, in an amount to be determined at trial. Investigation continues and Plaintiffs reserve the right to supplement this information after further discovery.

Respectfully submitted on behalf of Plaintiffs,

Dated: April 3, 2017

s/Christopher J. Williams  
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